

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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CONSUMER FINANCIAL PROTECTION  
BUREAU, et al.,

Plaintiffs,

v.

STRATFS, LLC (f/k/a STRATEGIC  
FINANCIAL SOLUTIONS, LLC) et al.

Defendants, and

DANIEL BLUMKIN, et al.,

Relief Defendants.  
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**NOTICE OF MOTION TO MODIFY  
PRELIMINARY INJUNCTION AND  
PROVIDE INSTRUCTION TO  
RECEIVER**

Civil Action No. 24-CV-40-EAW-MJR

**MOTION ON BEHALF OF:**

Royal Legal Group, LLC, and Hailstone  
Legal Group, LLC,  
by and through their attorneys,  
CONNORS LLP.

**DATE, TIME, AND PLACE  
OF MOTION:**

To be determined by this Court, before  
the Hon. Michael J. Roemer, United  
States District Court Judge, Robert H.  
Jackson United States Courthouse, 2  
Niagara Square, Buffalo, New York  
14202.

Oral argument is requested.

**RELIEF REQUESTED:**

An Order of this Court modifying the  
preliminary injunction to expressly  
exclude Royal Legal Group LLC and  
Hailstone Legal Group LLC, and  
instructing the Receiver to provide each  
with full access to tehri client data and  
cooperate to transition support services,

together with such other and further relief as this Court deems just and proper.

**GROUND FOR  
RELIEF REQUESTED:**

Fed.R.Civ.P. 65; Dkt. 184.

**SUPPORTING PAPERS:**

Declaration of Terrence M. Connors, dated October 17, 2024; Declaration of Rick Gustafson II, dated October 16, 2024; Memorandum of law in Support, together with all prior pleadings and proceedings.

Movants intend to submit reply papers.

DATED: Buffalo, New York  
October 17, 2024

/s/ Terrence M. Connors  
Terrence M. Connors, Esq.  
Andrew M. Debbins, Esq.  
CONNORS LLP  
*Attorneys for Intervenors,*  
*Royal Legal Group, LLC, and*  
*Hailstone Legal Group, LLC*  
1000 Liberty Building  
Buffalo, New York 14202  
(716) 852-5533  
tmc@connorsllp.com  
amd@connorsllp.com

Timothy D. Elliot, Esq.  
Emily Shupe, Esq.  
Rathje Woodward LLC  
300 E. Roosevelt Road  
Suite 220  
Wheaton, Illinois 60187  
(630) 510-4910  
telliott@rathjelaw.com  
eshupe@rathjelaw.com

TO: All Parties of Record (via CM/ECF)